

1 Marjorie L. Hauf, Esq.
2 Nevada Bar No.: 8111
3 Matthew G. Pfau, Esq.
4 Nevada Bar No.: 11439
5 H&P LAW
6 710 S. 9th Street
7 Las Vegas, NV 89101
8 702 598 4529 TEL
9 702 598 3626 FAX
10 e-file@courtroomproven.com

11 Nihat Deniz Bayramoglu, Esq.
12 Nevada Bar No. 14030
13 BAY LAW ACCIDENT ATTORNEYS
14 1540 W Warm Springs Rd., Ste. 110
15 Henderson, NV 89014
16 (702) 710-7000 TEL
17 (702) 553-3404 FAX
18 deniz@baylawinjury.com

19 Attorneys for Plaintiff,
20 *Andrea Cecere*

21 UNITED STATES DISTRICT COURT

22 DISTRICT OF NEVADA

23 * * *

24 **Andrea Cecere**, an individual,,

25 Case No.: 2:23-cv-02049-JAD-MDC

26 Plaintiff,

27 vs.

28 **LVGV, LLC**, a foreign corporation dba M
Resort Spa and Resort and Vig Deli; **The
Burks Companies, Inc.**, a foreign
corporation; Doe Individuals 1-1-; Roe
Business Entities 11-20

Defendant.

**Stipulation and Order to Continue
Hearing on ECF [49] LVGV, LLC.'s
Motion to Dismiss and to Extend
Dispositive Motion Deadline**

COMES NOW, Plaintiff Andrea Cecere and Defendants, LVGV, LLC., and The Burks Companies, Inc., by and through their respective counsel of record, stipulate and agree as follows:

1 **I. Discovery Completed To Date**

- 2 **a.** Deposition of Plaintiff;
- 3 **b.** Deposition of fact witnesses;
- 4 **c.** Exchange of written discovery;
- 5 **d.** Disclosure of experts;
- 6 **e.** Deposition of 30(b)(6) representatives for both defendants;
- 7 **f.** Deposition of experts.

8 **II. Discovery Left To Be Completed**

- 9 **a.** None

10 **III. Reasons For Extension**

11 **a. Hearing on LVGV's Motion to Dismiss Amended Complaint**

12 Defendant LVGV has a pending motion to dismiss punitive damages on the
13 pleadings that was set for March 5, 2025. The Court moved this hearing to March 20,
14 2025, for the Court's convenience, not because of a conflict not related to the parties'
15 schedule (ECF No. 59). The parties are needing to reschedule this hearing because
16 unfortunately Plaintiff's counsel has no attorneys available to appear on March 20,
17 2025.

18 **b. Dispositive Motion Deadline**

19 The parties were set for the dispositive motion deadline on March 14, 2025.

20 The parties request continuing the dispositive motion deadline to April 14
21 because what happens at the hearing on LVGV's Motion to Dismiss has a direct effect
22 on the parties' dispositive motion strategies. The parties have excusable neglect to
23 make this request because the Court's moving of the hearing was not at the parties'
24 request.

25 **IV. Proposed Schedule**

26 The parties propose continuing the dispositive motion deadline from March
27 15, 2025 to April 14, 2025. The pre-trial order would be due May 9, 2025. If a



1 dispositive motion is filed, it will be due 30 days from the entry of the order on that
 2 dispositive motion. Therefore,

3 IT IS HEREBY STIPULATED AND AGREED, that the hearing on ECF [49] LVGV, LLC.'s
 4 Motion to Dismiss currently set for March 20, 2025, at 11:30 a.m. be continued to
 5 March 24, 2025, at a time convenient for the Court or to the Court's next available
 6 date.

7 IT IS FURTHER STIPULATED AND AGREED, that the dispositive motion deadline be
 8 extended to April 14th, 2025.

9 DATED this 10th day of March, 2025

10 H&P LAW

11 */s/ Marjorie Hauf*
 12 Marjorie L Hauf, Esq.
 Nevada Bar No.: 8111
 Attorneys for Plaintiff

14 DATED this 10th day of March, 2025

15 HALL & EVANS, LLC

16 */s/ Adam Knecht*
 17 Adam R. Knecht, Esq.
 Nevada Bar No. 13166
 Todd B. Tuggle, Esq.
 Nevada Bar No. 6151
 Attorneys for The Burks Companies,
 Inc.

DATED this 10th day of March, 2025

WILSON ELSE

11 */s/ Jonathan Pattillo*
 12 Michael P. Lowry, Esq.
 Nevada Bar No. 10666
 Jonathan C. Pattillo, Esq.
 Nevada Bar No. 13929
 Attorneys for LVGV, LLC.

20 IT IS THEREFORE ORDERED the hearing on ECF [49] LVGV, LLC.'s Motion to
 21 Dismiss be continued to March 24, 2025, at 11:30 a.m.

22 IT IS FURTHER ORDERED the deadline to file dispositive motions is extended to April
 14, 2025.

24 IT IS SO ORDERED.

25 Dated: 3/17/2025

26
 27
 28 Jennifer A. Dorsey
 United States District Judge